

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

DET DAT and THOKAT KUOTH,	)	
Beneficiaries of GOA DAT, Deceased	)	
	)	CASE NO. 8:22CV444
Plaintiffs,	)	
	)	
v.	)	AMENDED COMPLAINT
	)	
THE INDEPENDENT ORDER OF	)	
FORESTERS,	)	
	)	
	)	
Defendant.	)	

The Plaintiffs complain of the Defendant and for cause of action against it allege:

1. Plaintiffs, at all times relevant to this Petition, are and have been residents of Douglas County, Nebraska;
2. That The Independent Order of Foresters at all times relevant to this matter, is an insurance company doing business in the State of Nebraska;
3. "Foresters Financial" is a brand name utilized by The Independent Order of Foresters
4. That on 28th day of July, 2021 Defendant issued a certificate of Accidental Death Term Insurance policy on the life of GOA DAT in the amount of \$100,000.00 on certificate #9215120. A copy of said policy is hereto attached, marked "Exhibit, A" and hereby made part hereof;
5. That the Plaintiffs were listed as the only beneficiaries on said insurance policy on the life of GOA DAT;
6. That on October 31, 2021 GOA DAT died in a manner which was covered by the terms of said policy;

7. That due notice of the death of the said GOA DAT was given to Defendant and proof of death was sent to the Defendant on or about the 2nd day of November, 2021;

8. Demand was made to the Defendant to pay the amount of said benefit certificate to the Plaintiffs. The Defendant refused and still refuses to pay the amount of said benefit certificate to the Plaintiffs;

9. Plaintiffs have fulfilled all requirements and terms of the above stated policy.

Plaintiffs therefore pray for judgment against the Defendant for \$100,000.00, together with interest thereon from September 19, 2021, costs of suit, the costs of bringing this matter and to recover attorney's fees pursuant to Neb. Rev. Stat. § 44-359 *et seq.*

Dated this 10th day of March, 2023.

DET DAT and THOKAT KUOTH,  
Plaintiffs

BY: /s/ Brent M. Bloom, #18239  
416 South 14th Street  
Omaha, NE 68102  
(402) 342-2833  
Attorney for Plaintiffs

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was filed March 10, 2023 electronically with the United States District Court for the District of Nebraska through CM/ECF and that the system generated electronic notification to:

Krista Eckhoff, Attorney for Defendant

Dated this 10th day of March, 2023.

/s/ Brent M. Bloom  
416 South 14th Street  
Omaha, Nebraska 68102  
(402) 342-2833  
Attorney for Plaintiffs